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LAWYERS' COMMITTEE FOR CIVIL RIGHTS
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Attorneys for Plaintiffs Eduardo I.T.; Edwin E.I.I.; Ignacio P.G.; Leonel Y.P.G., a minor child;
Benjamin J.R.; and William A.J.M.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDUARDO I.T., EDWIN E.I.I., Ignacio P.G.,
Leonel Y.P.G., a minor child, Benjamin J.R., and
William A.J.M.

Plaintiffs,

vs.

UNITED STATES OF AMERICA

Defendant.

Case No. 4:22-cv-05333-DMR

**DECLARATION OF BENJAMIN J.R.
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTIONS TO TRANSFER AND
DISMISS**

DEMAND FOR JURY TRIAL

1 I, Benjamin J.R., declare as follows:

2 1. I am a plaintiff in this action. I have personal knowledge of the facts stated in this
3 declaration and, if called as a witness, could and would testify competently as to those facts. I
4 understand that the Court has allowed me to litigate this case using a pseudonym. I am signing
5 this name using my pseudonym and I refer to my son by his pseudonym.

6 2. I intend to testify at the trial in this matter.

7 3. I am the father of plaintiff William A.J.M. William is currently 20 years old.

8 4. Traveling to Arizona for trial would be a burden on me and my family. I currently
9 work as a day laborer. I am paid on an hourly basis and do not receive payment if I cannot work.
10 If I needed to travel to Arizona for this case, I would not be able to work and would risk having
11 insufficient funds to pay for my and my son's monthly costs.

12 5. I do not have the financial resources necessary to litigate this case in Arizona. My
13 family's financial situation has been unstable since our arrival to the United States. We
14 consistently must make difficult decisions about how pay for housing and basic necessities. I do
15 not have extra funds to pay for my son and me to travel to Arizona and pay for lodging there.

16 6. Compared to a trial in Oakland, traveling to Arizona for trial would also be
17 disruptive to my son William. William works full time to help provide for our family. He does not
18 receive any paid vacation days that he could put towards travel time to Arizona.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. This declaration was executed on December 15, 2022 at Oakland,
21 California.

22
23 /s/ Benjamin J.R.

24 BENJAMIN J.R.

25 The undersigned attests that concurrence in the filing of this declaration has been obtained from
26 all signatories. Executed this 21st day of December, 2022.

27 /s/ Dustin Chase-Woods

28 DUSTIN CHASE-WOODS

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**CERTIFICATES OF
INTERPRETATION**

DEMAND FOR JURY TRIAL

ENGLISH-SPANISH CERTIFICATE OF TRANSLATION

My name is Victoria Petty and I am competent to translate from English to Spanish. I translated the foregoing document and following certificate of interpretation from English to Spanish and read it to Lleny Morales Nolasco in Spanish. Ms. Morales Nolasco affirmed that she fully understood the interpretation.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2022 in Montrose, California.

/s/Victoria Petty
Victoria Petty

SPANISH-MAM CERTIFICATE OF TRANSLATION

My name is Lleny Morales Nolasco and I am competent to translate from Spanish to Mam. I listened to the Spanish interpretation of the foregoing document provided by Victoria Petty, and I concurrently translated the document's contents to the declarant, Benjamin J.R., in Mam. Benjamin J.R. affirmed that he fully understood the interpretation, and that the contents of the foregoing document are true and correct.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December 2022 in Oakland, California.

/s/ Lleny Morales Nolasco
Lleny Morales Nolasco

The undersigned attests that concurrence in the filing of these certificates of interpretation has been obtained from all signatories. Executed this 21st day of December, 2022.

/s/ Dustin Chase-Woods
DUSTIN CHASE-WOODS